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BOB BURNS
Commissioner

ARIZONA CORPORATION COMMISSION

TO: Docket Control

FROM: Bob Burns
Commissioner

DATE: February 2, 2018

RE: Docket No. E-00000Q-16-0289

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I agree with Chairman Forese's January 31, 2018 memorandum; in particular the Chairman's concern regarding costs.

In addition to Chairman Forese's request for a thorough analysis by Commission Staff ("Staff") and the Residential Utility Consumer Office of the prospective costs, I would request that every electric utility in Arizona that would be affected by Commissioner Tobin's proposal provide their comments and their thorough cost analyses. I would like these comments to address the following items in particular:

1. Potential impact/consequences to ratepayers,
2. Possibility and magnitude of stranded investment,
3. Positive and/or negative impacts to reliability and resiliency,
4. Amount of additional investment that may be required,
5. Possibility and magnitude of possible negative pricing, and
6. Any other issues believed to be consequential.

In order to conserve Staff resources because the utilities have much more detailed information and data than does Staff, I believe Staff's comments and cost analysis should not be provided until at least thirty days after comments and analyses from the industry have been received.

A point that I would like to address here, that I believe is extremely important if any plan like this is going to succeed, is that it should be a statewide plan. Therefore, I would request that Salt River Project ("SRP") voluntarily also comment on Commissioner Tobin's proposal and that SRP voluntarily provide a cost analysis. All parties should also comment on how this plan could be a statewide plan, e.g., coordinate with the Governor's office and the State Legislature, special legislation, etc.

Any other interested parties may also provide their comments.

Robert L. Burns
Commissioner

Arizona Corporation Commission

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cc: Deborah Scott, Salt River Project

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On this 2nd day of February, 2018, the foregoing document was filed with Docket Control as a Correspondence From Commissioner, and copies of the foregoing were mailed on behalf of Bob Burns, Commissioner - A.C.C. to the following who have not consented to email service. On this date or as soon as possible thereafter, the Commission's eDocket program will automatically email a link to the foregoing to the following who have consented to email service.

John Fernandes
Renewable Energy Systems Americas Inc.
11101 W. 120th Ave., Suite 400
Broomfield CO 80021

Michele Van Quathem
LAW OFFICES OF MICHELE
VAN QUATHEM, PLLC
7600 N 15th St, Suite 150-30
Phoenix AZ 85020
mvq@mvqlaw.com

Consented to Service by Email

Benjamin Lowe
Alevo USA Inc.
2321 Concord Parkway South
Concord NC 28027
ben.lowe@alevo.com

Consented to Service by Email

Timothy M. Hogan
ARIZONA CENTER FOR LAW IN THE PUBLIC
INTERST
514 W. Roosevelt St.
Phoenix AZ 85003
azbluhill@aol.com

thogan@alcp.org
ken.wilson@westernresources.org

Consented to Service by Email

Court S. Rich
ROSE LAW GROUP, PC
7144 E. Stetson Drive, Suite 300
Scottsdale AZ 85251
CRich@RoseLawGroup.com
hslaughter@roselawgroup.com

Consented to Service by Email

Andrew Wang
SolarReserve, LLC
520 Broadway, 6th Floor
Santa Monica CA 90401
Andrew.Wang@SolarReserve.com

Consented to Service by Email

Jason Pistiner
SINGER PISTINER PC
15849 N. 71st Street, Suite 100
Scottsdale AZ 85254
jp@singerpistiner.com
kim.malfacini@sunrunhome.com

Consented to Service by Email

C. Webb Crockett
FENNEMORE CRAIG, PC
2394 E. Camelback Rd, Ste 600
Phoenix AZ 85016
pblack@fclaw.com
wcrocket@fclaw.com

Consented to Service by Email

Meghan H. Grabel
OSBORN MALEDON, PA
2929 N. Central Avenue Suite 2100
Phoenix AZ 85012
gyaquinto@arizonaaic.org
mgrabel@omlaw.com
kruht@omlaw.com

Consented to Service by Email

Melissa Krueger
ARIZONA PUBLIC SERVICE COMPANY
Thomas L. Mumaw
400 N. 5th St. Suite 8695
Phoenix AZ 85004
Amanda.Ho@pinnaclewest.com
Debra.Orr@aps.com
Melissa.Krueger@pinnaclewest.com
Kerri.Carnes@aps.com
Gregory.Bernosky@aps.com

Consented to Service by Email

Amanda Ormond
WESTERN GRID GROUP
7650 S. McClintock, Ste. 103-282
Tempe AZ 85284
amanda@westerngrid.net

Consented to Service by Email

Andy Kvesic
ARIZONA CORPORATION COMMISSION
Director- Legal Division
1200 West Washington
Phoenix AZ 85007
legaldiv@azcc.gov
utildivservicebyemail@azcc.gov

Consented to Service by Email

Michael Patten
SNELL & WILMER, LLP
One Arizona Center
400 East Van Buren Street, Suite 1900
Phoenix AZ 85004

Northern Arizona University
Karin Wadsack, Project Director
Box 5694
Flagstaff AZ 86011
karin.wadsack@nau.edu

Consented to Service by Email

Thomas L. Acker
1605 N. Wood Hollow Way
Flagstaff AZ 86004
amm2484@nau.edu

bdm88@nau.edu

elj52@nau.edu

Tom_Acker@msn.com

Consented to Service by Email

By: 
Lynn Jahnke
Executive Aide to Commissioner
Burns